IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR) [Lead Case]

GREG ABBOTT, et al.,

Defendants.

UNITED STATES' RESPONSE TO DEFENDANTS' MOTION TO DISMISS

The United States respectfully responds to Defendants' Motion to Dismiss (ECF No. 1107). The Fifth Circuit concluded that "all of the evidence supports that SB 5 was designed to remedy every defect [in SB 14] claimed in the Plaintiffs' evidence and to supply indigent voter protections recommended by this court's remand order." *Veasey v. Abbott*, 888 F.3d 792, 802 (5th Cir. 2018); *see also id.* at 804 ("SB 5 constitutes an effective remedy for the only deficiencies testified to in SB 14."). Pursuant to the Fifth Circuit's mandate, and for the reasons that the United States previously explained, *see* U.S. Remedies Br. (ECF No. 1052); U.S. Remedies Response Br. (ECF No. 1060), this Court should enter a final judgment stating that no further relief is warranted for the liability previously found as to SB 14, in light of the remedy provided by SB 5.

Date: August 7, 2018

Respectfully submitted,

JOHN M. GORE Deputy Assistant Attorney General Civil Rights Division

/s/ John M. Gore

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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2018, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Daniel J. Freeman

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